

**In the United States Court of Appeals
for the District of Columbia Circuit**

GWYNNE A. WILCOX,

Plaintiff-Appellee,

v.

DONALD J. TRUMP, in his official capacity as President of the
United States, MARVIN E. KAPLAN, in his official capacity as
Chairman of the National Labor Relations Board,

Defendants-Appellants.

On Appeal from the United States District Court
for the District of Columbia

**NOTICE OF INTENT TO FILE BRIEF OF FORMER NATIONAL
LABOR RELATIONS BOARD MEMBERS AS *AMICI CURIAE* IN
OPPOSITION TO APPELLANTS' EMERGENCY MOTION
FOR A STAY PENDING APPEAL**

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**NOTICE OF INTENT TO AND REPRESENTATION OF
CONSENT TO FILE BRIEF OF *AMICUS CURIAE***

Pursuant to D.C. Circuit Rule 29, former Members of the National Labor Relations Board Lauren McFerran, Mark Gaston Pearce, Wilma Liebman, Nancy Schiffer, Sarah Fox, and Charles Cohen hereby give notice that they intend to file a brief as *amicus curiae* in opposition to appellants' emergency motion for a stay pending appeal. All parties have consented to the filing of this brief.

Dated: New York, NY
March 11, 2025

Respectfully submitted,

/s/ *Dennis Fan*
Dennis Fan, *Director*
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the District of Columbia Circuit using the Court's CM/ECF system on March 11, 2025, which will send notice of such filing to counsel, all of whom are CM/ECF registered users.

Dated: March 11, 2025

/s/ *Dennis Fan*
Dennis Fan
Counsel for *Amici Curiae*